

### **REMARKS/ARGUMENTS**

The Office Action has been carefully considered. The issues raised are traversed and addressed below with reference to the relevant headings and paragraph numbers appearing under the Detailed Action of the Office Action.

#### ***Claim Rejections – 35 U.S.C. §103***

The Examiner has maintained objections to the claims on the basis of the cited "Intelligent Paper" reference.

We respectfully reiterate our previous comments that we do not believe it would be obvious to combine the teaching of this document with knowledge of demographic targeted marketing to teach the requirement of the claims. In particular, there is nothing within the "Intelligent Paper" reference to suggest that it can have a use to provide printed documents that are formatted in accordance with stored user preferences.

In this regard, we note that the Examiner has drawn our attention to page 401 as indicating that the user's address is known and stored on a system. However, this does not describe that documents are formatted in accordance with the user preferences, and in fact there is nothing within the teaching of this document to suggest that printed documents would be in anything other than a standard predetermined format.

In this regard, the Examiner has asserted that as the intelligent paper could be used as a web-page, then this renders it obvious that the demographic information may be used for formatting. We respectfully submit that this is not the case. When web-pages are displayed as electronic documents, the provision of Hyper-text Mark-up Language, allows the appearance of the page to be configured for use on the respective display device. Interactivity is then feasible as the electronic device is able to interpret input commands, using standard input devices.

However, in the case of intelligent paper, formatting the document and ensuring that selection of a user interactive element may be achieved is more complex as the detection of a selection must be performed remotely. As this requires interpretation of signals from the sensing device, this becomes a more complex procedure, and there is no disclosure in the "Intelligent Paper" reference of how responsiveness for individual user tailored documents could be achieved.

If a document is formatted differently due to different user preferences, the position of the user interactive element may vary between versions of the document. For example, if two users print the same document but specify different font sizes in their user preferences, then the spacing of text within the document would be different in both cases. As a result, a user interactive element positioned after the text would be in a different position in the two documents. In contrast, as the coded data is pre-printed, the position of the coded data is fixed.

The result of this is that when each user selects the user interactive element on the respective document, the signal generated by the sensing device will represent a different page location. However, the "Intelligent Paper" reference does not teach any mechanism by which this could be resolved, and therefore does not allow for the formatting of a document to vary from user to user depending on respective preferences.

Instead, the "Intelligent Paper" reference merely teaches that the system may detect ownership by an individual of a respective document. However, as will be appreciated by the Examiner, this merely requires knowledge that a document having a respective *page-id* is owned by a respective individual, and does not distinguish between the formatting of the documents.

In contrast, the present invention utilises publication servers to format the document based on user preferences. The format used can then be stored as a page description allowing the position of user interactive elements to be retrieved for that specific document.

The use of such publication servers is not disclosed in the "Intelligent Paper" reference and is not obvious based on demographic marketing information.

Thus we do not believe a combination of the "Intelligent Paper" reference and knowledge of demographic marketing renders the claims obvious.

In any event, we also submit that there are additional distinctions in the claims which are not disclosed by such a combination.

In this regard, we note that the Examiner has specified in previous Office Actions that claim 14 includes substantially parallel limitations to claim 1, and we respectfully submit that this is not the case. In particular, we believe that claim 14 highlights some further major distinctions over the "Intelligent Paper" reference. Accordingly, in order to obtain speedy allowance of the case and to overcome the Examiner's outstanding objections claim 1 has been amended to correspond to independent claim 14.

In particular, whilst claim 1 was previously only limited to providing a printed document, claim 14 explicitly includes reference to requirements for both a publication server, and a printer for printing information received from the publication server. We respectfully submit that this is not taught or even remotely suggested by the "Intelligent Paper" reference.

In this regard, as clearly set out on pages 8 and 9 of our previous response, the claimed system utilises an advantageous system arrangement in which a publication server is used to provide content formatted according to a reader's explicitly stated and implicitly captured profile.

The system operates by allowing the publication server to dynamically assess the information that is to be printed and then format this information in the appropriate manner. The formatted information is then provided to a printer that then prints a document with at least one interactive element. The provision of a printer, which receives information from a publication server and then prints a formatted document with an interactive element is not shown in the "Intelligent Paper" reference.

In this regard, as clearly set out on the first paragraph page 394 of the cited reference, the "Intelligent Paper" system works by having an authorised producer produce sheets of paper which include encoded data. A publisher then uses the apparently blank sheets to print information with conventional visible inks.

Thus, the publisher only prints information on the sheet, and does not print the document with a user interactive element.

In contrast to this, the system of the current application operates to print not only information formatted in accordance with stored user preferences but also the at least one interactive element, which as the Examiner will appreciate is embodied in one example by netpage tags.

We respect that we submit that this distinction was previously clearly embodied in claim 14 which requires the presence of a printer for printing the document with at least one interactive element. This is clearly not taught or suggested by the "Intelligent Paper" reference.

Instead, the "Intelligent Paper" reference requires the presence of a first printer for printing the sheets including the coded data (which embodies the user interactive element) and a second printer for printing the visible information thereon. This mechanism does not allow the coded data to reflect the visible information printed on the page. This represents a substantial disadvantage over the system of the present invention.

In particular, the system defined by claim 14 allows a printer to be provided at the so-called point of consumption (ie, the printer can be provided in a user's home or the like). This is clearly discussed on page 10, lines 19 to 28 of the specification as filed.

In contrast to this, in the system of the "Intelligent Paper" reference such an arrangement is not possible as the paper must be pre-printed with coded data and then subsequently and separately printed with the visible information. As a result, this will not allow the "Intelligent Paper" system to automatically and dynamically format the information as set out in the claims.

Thus, the "Intelligent Paper" reference, as it uses pre-printed substrates, provides no mechanism for determining a concordance between the coded data provided on the substrate and the desired position of user interactive elements, which as will be appreciated by the Examiner, may vary in position dependent on the formatting of the information presented thereon, and will therefore in turn depend on the user preferences.

It is also apparent from this, that the system of the "Intelligent Paper" reference suffers from disadvantages in accuracy. In particular, when visible information is printed onto the pre-coded substrate, it is vital that the information be printed at the intended location so that it corresponds to the intended coded data. If the paper is skewed during printing for example, the position of the visible information will not be as intended, and accordingly, the designation of the user interactive element will not function correctly.

In contrast, in the current system, the positioning of the user interactive element, and the coded data that embodies the element, can be controlled dynamically at the time the formatting is performed by the publication server. This information can then be transferred electronically to the printer, thereby ensuring that the user interactive element can be correctly provided on the respective page. Furthermore as the visible information is printed at the same time, concordance between the visible information and the user interactive element will always be ensured.

The fact that the dynamic and responsive operation of the system allow the information to be formatted and printed on demand (ie, at the time a request is made by a user) makes the system ideally suited for providing content targeted to demographics of the user based on stored user preferences. In particular, this allows the formatted information to incorporate the user interactive element in a manner that is not feasible with the system of the prior art.

In this regard, we note that the Examiner has acknowledged that Dymetman can provide product catalogues that are formatted with the user's address to allow a catalogue to be transferred by standard mail. This highlights that the system requires pre-printing and subsequent mailing of the information and does not allow the documents to be printed at their point of consumption.

Thus, the arrangement of the claims in which a printer receives formatted information from a publication server and then uses the formatted information to print a document and a user interactive element is not taught or even suggested by the "Intelligent Paper" reference.

Furthermore, we would submit that it is not even possible to use the "Intelligent Paper" system in the manner taught by claim 1 due to the inherent limitation in having the coded substrate printed during a separate step.

In view of this, we respectfully submit that the claims are novel and inventive.

We appreciate that this is a final Office Action and that the Examiner is not bound to consider new issues raised but we would highlight that these distinctions were present in claim 1 both as filed and as amended during our previous response. Furthermore, these distinctions were clearly set out on pages 8 and 9 of our previous response.

In view of this, we respectfully request reconsideration of the objections in this case.

In light of the above, it is respectfully submitted that the objections and claim rejections have been successfully traversed and addressed. The amendments do not involve adding any information that was not already disclosed in the specification, and therefore no new matter is added. Accordingly, it is respectfully submitted that the claims 1 to 28, and the application as a whole with these claims, are allowable, and a favourable reconsideration is therefore earnestly solicited.

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

Applicants:



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